

CORRECTIVE ACTION 101  
RIVERVIEW TRENTON RAILROAD COMPANY  
- RTRR -

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JUNE 11, 2020

# AFTER WYANDOTTE BUTCHERS

TRENTON HEALTH AUTHORITIES  
SAY RIVER IS POLLUTED.

Trenton's health authorities have declared war on Wyandotte butchers. They claim that the meat men are polluting the waters of Monguagon creek, which flows into the Detroit river just above the village. It is said that the bridge over the creek below Wyandotte is a favorite dumping ground for the butchers and that they dump all the offal and waste from the slaughter houses into the creek here where it flows into the river and makes the water impure. This is denied by the butchers. They say that the intake pipe of the water works is too far out in the river to be reached by the water from Monguagon creek.



# Corrective Action Facilities

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Facilities are generally brought into the Corrective Action process when:

- there is an identified release of hazardous waste or hazardous constituents, or
- when considering a treatment, storage and disposal facility (TSDF) RCRA permit application.

# An aside...

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- Resource Conservation and Recovery Act of 1976, as amended (**RCRA**)
- Michigan's Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), and the administrative rules promulgated thereunder (**Part 111**)

# RTRR's origins

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Part of the McLouth Steel facility, on which hazardous waste was managed

In 2000(?) DSC sells 76 acres of the McLouth property to RTRR

RTRR filed deed notice in 2002 - this notice states that the property has been used to manage hazardous waste and is subject to corrective action





# Corrective Action Process

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- A typical cleanup may include elements such as:
  - Initial Site Assessment
  - Site Characterization
  - Interim Actions
  - Evaluation of Remedial Alternatives
  - Remedy Implementation

# Corrective Action Elements

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- Initial Site Assessment
- Site Characterization
- Interim Actions

\*First done in 1998 covering the entire McLouth property

\*CACO signed in 1999 by DSC and EGLE



# Corrective Action Consent Order

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- A CACO is legally enforceable in court
  - WMD Order No. 111-15-99
  - WMRPD Order No. 111-06-2018
- The corrective action process will be done *in phases* for RTRR

# Phase I (where we are now)

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- Investigate five waste management units
- Prepare and implement dust control plan
- Investigate groundwater contamination
- Evaluate stormwater management
- Utilize applicable Part 201 environmental protection standards adopted in Part 111

# Phase II (potential/future)

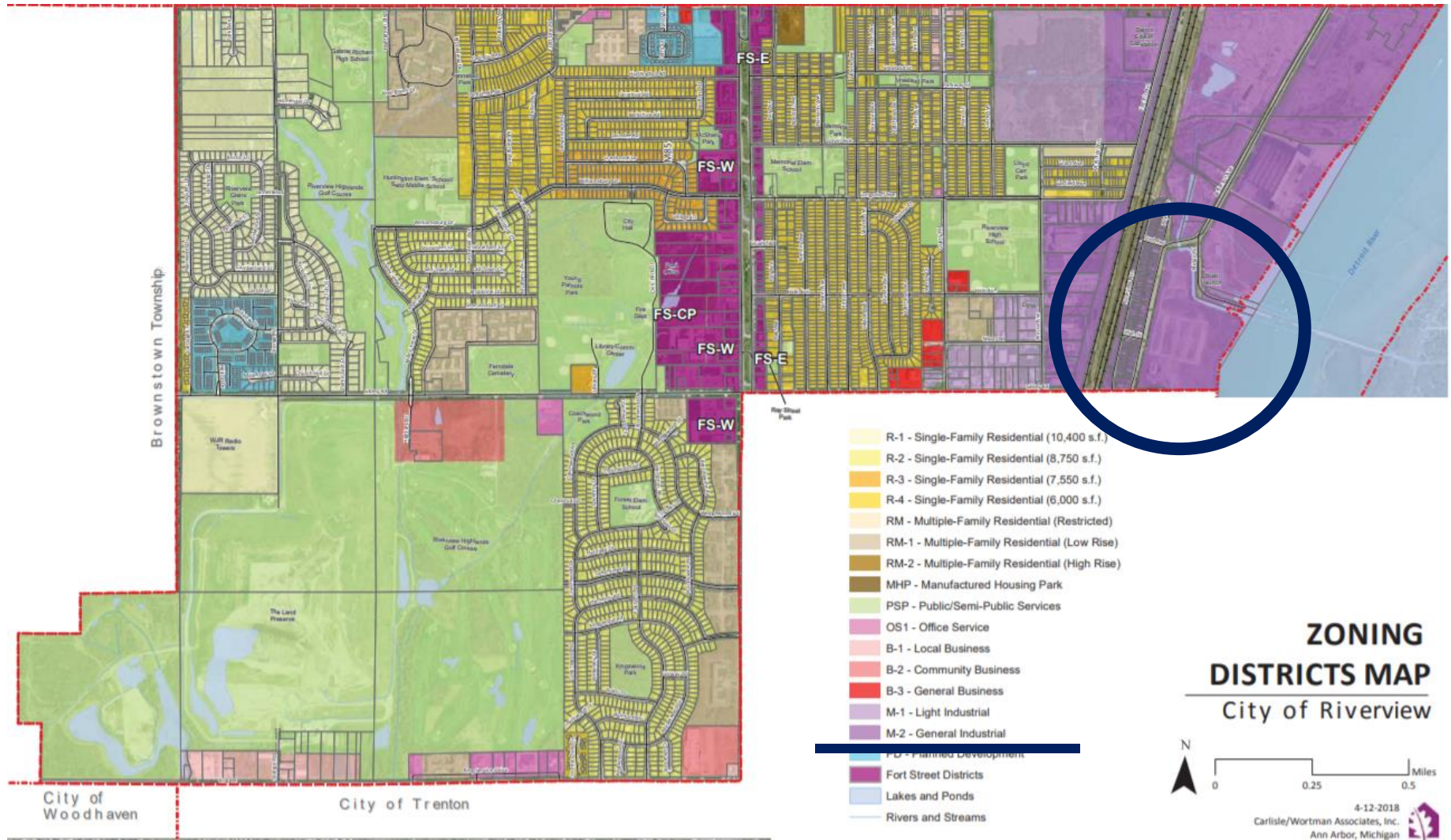
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- The need to develop and implement corrective measures to address groundwater contamination.
- The need to implement stormwater/surface water run-off mitigation measures identified.
- The need for additional unplanned monitoring and maintenance determined to be necessary after completion of the Work pursuant to the Work Plan.
- The need to further investigate and implement corrective measures for new WMUs or AOCs identified during the course of implementation of the Work that are not required to be addressed through Interim Measures.
- The need to further investigate and/or address contamination whose source is the RTRR Facility in soil, groundwater, or sediment beyond the RTRR Facility boundary, where necessary to protect human health and the environment.

# Future Corrective Action Elements

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- Evaluation of Remedial Alternatives
- Remedy Implementation
  - Controls – institutional and engineered



# Corrective Action Elements

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- Long-Term Care
  - Corrective Action Long Term Agreement (CALTA)



# QUESTIONS?



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